IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

NORTH CYPRESS MEDICAL CENTER	§	
OPERATING CO., LTD. AND NORTH	§	
CYPRESS MEDICAL CENTER	§	
OPERATING COMPANY GP, LLC.	§	
	§	
Plaintiffs,	§	
	§	
V.	§	CIVIL ACTION NO. 4:09-CV-02556
	§	
CIGNA HEALTHCARE AND	§	
CONNECTICUT GENERAL LIFE	§	
INSURANCE COMPANY	§	
	§	
Defendants.	§	
	_	

CIGNA'S RESPONSE TO NORTH CYPRESS'S MOTION TO SEAL CERTAIN DOCUMENTS

LAW OFFICE OF ALAN W. HARRIS

Alan W. Harris Attorney-in-charge State Bar No. 09050800 Southern District ID No. 2171 325 N. St. Paul Street, Suite 2700 Dallas, Texas 75201

Telephone: (214) 965-8200 Telecopier: (214) 965-8209

COUNSEL FOR DEFENDANTS

Defendants Connecticut General Life Insurance Company, CIGNA Healthcare, and CIGNA Healthcare of Texas Inc. (together, "Cigna") hereby submit their Response to the Motion to Seal Certain Documents filed by Plaintiffs North Cypress Medical Center Operating Co., Ltd. and North Cypress Medical Center Operating Co. GP, LLC (together, "North Cypress") (D.E. 420) (the "Motion to Seal").

North Cypress did not confer with Cigna about its intent to move to seal certain documents attached to North Cypress's motion to compel Cigna to adjudicate claims (D.E. 418). Contrary to North Cypress's assertion otherwise (D.E. 420 at ¶ 2), Cigna does not oppose the Motion.

DATED this 23rd day of November, 2015.

Respectfully submitted,

/s/ Alan W. Harris

Alan W. Harris Attorney-in-charge State Bar No. 09050800

Southern District ID No. 2171 325 N. St. Paul Street, Suite 2700

Dallas, Texas 75201

Telephone: (214) 965-8200

Telecopier: (214) 965-8209

Joshua B. Simon

Warren Haskel

Richard W. Nicholson

Kirkland & Ellis LLP

601 Lexington Avenue

New York, New York 10022 Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Facsimile: (212) 446-4900

COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on November 23, 2015, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Southern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who are known "Filing Users":

J. Douglas Sutter, Esq. Kelly, Sutter & Kendrick, P.C. 3050 Post Oak Blvd., Suite 200 Houston, TX 77056 Telephone: (713) 595-6000

Facsimile: (713) 595-6001

In addition, I served a true and correct copy of the foregoing document via e-mail on Mr. Sutter.

/s/ Alan W. Harris
Alan W. Harris